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Subject: NW Natural, DEQ Comments to RI and Risk Assessment Reports
Date: 03/10/2010 06:02 PM
Attachments: [Lfni-NWN-RI&IRA_Reports-10Mar10.pdf](#)
[Tbl1 Lfni-RI&RA_Reports-10Mar10.pdf](#)

Hello Bob.

The Department of Environmental Quality (DEQ) reviewed the following documents:

- “Remedial Investigation Report, NW Natural – Gasco Facility, Portland, Oregon,” dated April 30, 2007 (RI Report); and
- “Revised Baseline Ecological and Human Health Risk Assessment Report,” dated December, 2004 (Risk Assessment).

A soft copy of our comments letter is attached.

<<Lfni-NWN-RI&IRA_Reports-10Mar10.pdf>> <<Tbl1_Lfni-RI&RA_Reports-10Mar10.pdf>>

A signed hard copy of the attachment will be sent to you via regular mail this week.

The primary purpose of the DEQ’s comments letter is to inform NW Natural that based on review of the RI Report, Risk Assessment, and other supporting documents:

- DEQ accepts the RI Report and the supporting documents as satisfying the requirements of the Voluntary Agreement for an RI of the NW Natural Property.
- DEQ determines there are data gaps with regard to characterizing the nature and lateral and vertical extent of MGP contamination, but except as noted in DEQ’s comments, uplands investigations have sufficiently characterized the NW Natural Property to support: 1) evaluations of potential risks to human health and ecological receptors from exposure to MGP waste and contamination, and 2) uplands removal action planning and feasibility study scoping. Additional data collection is warranted to further assess potential soil and groundwater contamination in the northern portion of the NW Natural Property and for completing the Risk Assessment.
- DEQ does not accept the Risk Assessment and expects NW Natural to supplement site data, conduct an updated screening analysis of contaminants of interest (COI), incorporate the results into the ERA and HHRA, and revise and resubmit the document consistent with the comments detailed in this letter.

DEQ currently anticipates using our monthly meeting scheduled for Monday March 15th to discuss the comments letter.

Please feel free to contact me with questions regarding this e-mail and attachment.

Mr. Dana Bayuk, Project Manager

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